

SAPONE & PETRILLO, LLP

William S. Petrillo, Esq., Partner
Edward V. Sapone, Esq., Partner

MANHATTAN

1 Penn Plaza, Suite 5315
New York, New York 10119
Telephone: (212) 349-9000
Facsimile: (212) 349-9003
E-mail: ed@saponepetrillo.com

Chase S. Ruddy, Esq., Senior Associate
Michael Vitaliano, Esq., Associate

LONG ISLAND

1103 Stewart Avenue, Suite 200
Garden City, New York 11530
Telephone: (516) 678-2800
Facsimile: (516) 977-1977
E-mail: william@saponepetrillo.com

July 27, 2020

Hon. Brian M. Cogan
U.S. District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States of America v. Gregory Altieri
Ind No. 20-CR-0249 (BMC)

Dear Judge Cogan,

I am retained counsel to Defendant Gregory Altieri in the above-referenced case. Following the Court's email on July 23, 2020, the United States Attorney's Office ("USAO") and Defendant Gregory Altieri respectfully submit this joint status report in lieu of a remote status conference. This report addresses discovery-related matters and other matters the parties wish to inform the Court of.

(1) PLEA NEGOTIATIONS

Mr. Altieri and the USAO have begun to engage in plea negotiations to resolve his case without the need for a trial. There are lots of issues the parties must consider and discuss before arriving at a potential resolution, and we have begun a dialogue.

(2) DISCOVERY

The USAO has turned over to me an electronic copy of voluminous discovery, including Mr. Altieri's books and records, bank records and other financial documents. My review of this discovery has been made difficult by the pandemic, as my firm has been shut down since March 16, 2020. I am doing my best to work from my home office, and my staff is separately working from home. It has

also been a challenge to review discovery with Mr. Altieri under these circumstances. Nonetheless, we have been in constant contact and we are working diligently.

(3) EXCLUSION OF TIME

The parties agree that for the above-stated reasons, and mindful pandemic, time be excluded for a period of sixty (60) days from July 30, 2020.

(4) CONCLUSION

The undersigned for Mr. Altieri and the USAO have conferred by telephone to discuss the issues raised in, and the filing of, this joint status report.

Respectfully submitted,

/s/ Edward V. Sapone
Sapone & Petrillo, LLP
Counsel to Defendant
Gregory Altieri
1 Penn Plaza, Suite 5315
New York, New York 10119
Telephone: (212) 349-9000